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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

IN RE:	:	
	:	
JUSTINE & THOMAS P.	:	
CHAMBERLIN,	:	CASE NO. 05-47169 DHS
	:	
Debtor(s)	:	ADVERSARY PROCEEDING
	:	
CHASE BANK USA, N.A.,	:	CHAPTER 7
	:	
Plaintiff.	:	ADV. NO. 06-01165 DHS
	:	
v.	:	
	:	
JUSTINE CHAMBERLIN,	:	
	:	
Defendant (s).	:	

ANSWER TO COMPLAINT FOR NON-DISCHARGEABILITY OF DEBT

Defendant Justine Chamberlin, by way of Answer to the Adversary Complaint states as follows:

JURISDICTION: VENUE PARTIES

1. This states a jurisdictional basis for the suit, and no response is required.
2. Admitted.

3. Neither admit or deny, but leave plaintiff to proofs.

FACTS APPLICABLE TO ALL COUNTS

4. Defendant admits that this debt was listed on her bankruptcy petition as an unsecured debt. Defendant neither admits nor denies the amount of the debt, but leaves the plaintiff to its proofs.
5. Defendant neither admits nor denies the allegations in Paragraph 5, but leaves the plaintiff to its proofs.
6. Admitted.
7. Admitted
8. Paragraph 8 states a legal conclusion and it therefore denied.
9. Denied.
10. Denied.
11. Denied.
12. Denied.
13. Denied.
14. Denied.

COUNT I

NON-DISCHARGEABILITY – 11 U.S.C. Section 523 (a)(2)(A)

15. Defendant repeats its Answers to Paragraphs 1 through 14 as if set forth at full length herein.
16. Denied.

COUNT II

NON-DISCHARGEABILITY – 11 U.S.C. Section 523 (a)(2)(C)

17. Defendant repeats its Answers to Paragraphs 1 through 16 as if set forth at full length herein.
18. Denied.

WHEREFORE, Defendant Justine Chamberlin respectfully requests that this case be dismissed as against her with prejudice, and without costs.

SPECIFICATION OF DEFENSES

FIRST SEPARATE DEFENSE

All charges incurred by Defendant on the Plaintiff's credit card were made with the intent of fully repaying the debt.

SECOND SEPARATE DEFENSE

Defendant was not insolvent when charges on the credit card were made.

BARRY E. LEVINE
Attorney for Defendant
Justine Chamberlin

By: /s/ Barry E. Levine
BARRY E. LEVINE

Dated: 2/24/06

FILING CERTIFICATION

I hereby certify that the within Answer to Complaint was filed with the Clerk, United States Bankruptcy Court, and a copy served on my adversary via electronic filing.

Dated: 2/24/06

By: /s/ Barry E/ Levine
BARRY E. LEVINE